

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES OF AMERICA.,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE
v.	)	
	)	NO. 1:16-CV-03088-ELR
STATE OF GEORGIA, et al.	)	
	)	
Defendant.	)	
	)	

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**DEFENDANTS' NOTICE OF DEPOSITION  
OF SAMUEL CLEMONS, DIRECTOR, HORIZON ACADEMY GNETS  
PROGRAM**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Defendants, by and through their counsel of record, will take the deposition of **SAMUEL CLEMONS, DIRECTOR, HORIZON ACADEMY GNETS PROGRAM**, (hereinafter "Deponent"), regarding the Deposition Subject Matter listed below on November 10, 2022 beginning at 9:00 a.m. Eastern Time, or such other time as is agreed upon by the parties, at Horizon Academy, 2510 West Blvd., Moultrie, Georgia 31768 or by way of a virtual format, if counsel so agree, or at another location mutually agreed upon by the parties. If, for any reason, the taking of said

deposition is not completed on said date, it will continue from day to day, excluding weekends and holidays, until completed.

PLEASE TAKE FURTHER NOTICE that pursuant to Fed. R. Civ. 30(b)(3) Defendants intend to utilize a stenographic method of recording which permits the “real time” instant visual display of testimony.

PLEASE ALSO TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(3)(A), the deposition testimony will be recorded by stenographic and audiovisual means. The deposition will be videotaped and Defendants reserve the right to use at the trial of this action the video recording of the deposition.

Respectfully submitted,

/s/ Josh Belinfante

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**L.R. 7.1(D) CERTIFICATION**

I certify that this Notice has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Notice has been prepared using 14-pt Times New Roman Font.

/s/ Josh Belinfante  
Josh Belinfante

**CERTIFICATE OF SERVICE**

Pursuant to the Northern District of Georgia Local Rule 5.4, counsel for Defendants hereby certify that the undersigned electronically filed the foregoing **DEFENDANTS' NOTICE OF DEPOSITION OF SAMUEL CLEMONS, DIRECTOR HORIZON ACADEMY GNETS PROGRAM** with the Clerk of the District Court using the CM/ECF System, which automatically sends e-mail notification of such filing to all attorneys of record.

This 9th day of November 2022.

/s/ Josh Belinfante  
Josh Belinfante